



Future Approaches to the External Quality Enhancement of UK Higher Education Transnational Education

Consultation Report

Introduction

Transnational education (TNE) is an important component of UK higher education provision. In 2018-19, 142 universities reported they had TNE students in 226 locations (countries, territories and administrations), with over 660,000 students studying for UK awards outside of the UK. TNE is also one of the pillars of the cross-government [International Education Strategy](#), and it is supported by the [Global Wales](#) and [Connected Scotland](#) initiatives.

The success of UK higher education transnational education (UK TNE) is underpinned by its reputation for quality - a reputation recognised by students and their families, and by overseas regulators and agencies; and which makes UK universities partners of choice internationally.

UK providers are ultimately responsible for the academic standards of their awards and for the quality of provision irrespective of where or how courses are delivered or who delivers them. External regulation and quality assurance provide a framework for ensuring that baseline quality requirements are met. UK TNE reputation is further strengthened by robust quality enhancement mechanisms - both internal and external - and by the comprehensive regulatory and funding frameworks applied in the four UK nations.

External regulation and quality assurance in the UK are built on shared characteristics and requirements but, recently, the way in which this is delivered in practice, in each of the UK's nations, has become more diverse in line with differing needs and policy drivers. In particular, changes to the higher education regulatory system in England have had implications for the external quality assurance and enhancement of UK TNE.

In late 2018, the Universities UK (UUK) Board recommended the establishment of a joint working group of QAA, GuildHE and UUK to explore the question: 'What is needed to implement an approach to the quality enhancement of UK TNE that strengthens the reputation of the UK higher education sector and is economically sustainable?'. The working group met three times between January and March 2019, and agreed a set of 11 guiding principles (Annex A) and two models to enhance the quality of TNE. These were endorsed by the UUK Board and the GuildHE Executive for public consultation.

The consultation opened on 16 October 2019 and closed on 3 January 2020, the analysis of and report on the consultation data was completed by an independent analyst, with the recommendations contributed by QAA, UUK and GuildHE.¹

¹ The full consultation analysis is published separately and is available on request.

Key findings

The consultation received a total of 105 responses - 74 UK higher education institutions providing institutional responses; four representative groups of higher education providers; four UK and overseas organisations; six overseas quality bodies and 17 individual responses. All responses were considered in the analysis. Responses were representative across the four nations, institution size, institution type and mission group, as well as size of TNE student numbers. The overseas responses included business, university and quality body perspectives.

The consultation analysis of both quantitative and qualitative data provided by the 105 respondents, concluded that there was a strong agreement that a UK-wide approach to TNE was important to maintain comparability of UK transnational education and maintain standards across the full range of provision. There was also a desire from respondents to reaffirm the language, terms and definitions for both TNE, and quality assurance and enhancement.

The guiding principles proposed in the consultation (Annex A) were seen to encompass the values of UK higher education and were therefore applicable to UK TNE. There were some minor concerns about how to ensure equivalence of the student experience and the concern that the metrics referred to in principle 11 were seen as not yet having been defined. Responses demonstrated a deep commitment to the development of UK TNE, alongside a strong pride that UK higher education and UK TNE are internationally valued. Students were seen as integral stakeholders and comments throughout the consultation sought further exploration of ways in which students could participate in any development of quality assurance and enhancement for UK TNE.

The comments on Model One and Model Two demonstrated that respondents predominantly want a system of both quality assurance and enhancement. The overall preference was to have a system where a programme of TNE activities and resources was complemented by an in-country review schedule. Examples of the TNE activities and resources included: guidance and reports on specific countries or regions, best practice toolkits, practical guidance, case studies, training courses, better data, territory-based communities of practice, and templates for assessments.

When considering which countries should be reviewed, it was felt that an 'annual' cycle of reviews should consider emerging markets, developing markets and core markets - based on TNE student numbers and number of arrangements. It was also suggested that consideration should be given to how in-country review could be adapted to each respective country to ensure a context-responsive, risk-based, and proportionate approach to what will provide most impact and value to providers. Flexibility and choice for providers would mitigate any disagreement around which aspects of TNE quality assurance and enhancement were considered valuable.

A UK-wide approach

The vast majority (95%) of responses agreed or strongly agreed that any quality enhancement system should retain a UK-wide approach. 4% neither agreed nor disagreed and 1% disagreed.

There was a clear agreement in the comments that a UK-wide approach would ensure parity of experience for students, staff, UK providers and international partners. It would also acknowledge international perceptions of UK higher education as a cohesive sector, while respecting current variations in approach to UK TNE across the four nations.

A UK-wide approach would allow for the development of areas such as quality and provision of data, sharing of best practice, and TNE community building. A common concern centred on *how* a UK-wide approach would function in relation to respective regulatory frameworks across the four nations. This question was particularly significant for English providers given the regulator's progressive implementation of a risk-based monitoring and intervention approach to transnational education.

The 11 guiding principles

91% of respondents agreed or strongly agreed that any quality enhancement system should be underpinned by the 11 principles outlined in the consultation. Just 6% of respondents disagreed and 3% neither agreed nor disagreed.

The 11 guiding principles proposed in the consultation (Annex A) were considered to reflect the values of UK higher education. Principles 7 and 8, regarding students and their experience, were highlighted as particularly important. There was uncertainty about how any UK-wide approach could ensure equivalence of student experience and student outcomes, given contextual differences in-country and the current data landscape not fully capturing the information needed to understand and develop this area of UK TNE.

There was some concern expressed about principle 11 ('be informed by robust metrics where available and align with UK data-informed approaches where possible') as to the availability of data to inform the system. It was suggested that developments of any quality assurance and enhancement for UK TNE was designed in collaboration with in-country regulators and authorities to promote collaboration, accountability and align with in-country priorities of regulators and authorities. The respondents recognised it as an important challenge for UK TNE to determine an appropriate balance between adherence to the principles and values of UK TNE while respectfully acknowledging cultural differences.

Model One

In the consultation, Model One was defined as accepting that existing national mechanisms applied in the UK are broadly sufficient to enhance the quality of TNE provision, with additional measures taken on an ad hoc basis where improvements could be made.

There were concerns expressed about the different approaches to quality assurance and enhancement in each nation and about how to maintain a UK-wide approach to transnational education. 38% strongly agreed/agreed with Model One but the comments for this group predominantly sought further development of the TNE activities and resources mentioned above. 43% of respondents disagreed or strongly disagreed with Model One. The remaining 19% neither agreed nor disagreed. Disagreement with in-country reviews in Model One does not mean that respondents do not support further development and assurance of quality within UK TNE. The overseas respondents sought a clear UK-wide approach to UK TNE that would ensure consistency across TNE arrangements and standardise requirements, so that expectations were clear and accountable.

Model Two

In the consultation, Model Two was defined as adding a regular programme of in-country quality enhancement reviews to existing national quality assurance and enhancement mechanisms. A majority of 60% agreed or strongly agreed, while 25% strongly disagreed or disagreed.

The comments acknowledged that in-country reviews provided an overview of context and regulatory environment through a trusted peer-review process. A few responses disagreed

with Model Two solely because Model One was seen to provide robust assurance. These respondents also questioned which aspects of the existing mechanisms were seen to not provide assurance. Respondents who strongly disagreed/disagreed with Model Two were predominantly those who strongly agreed/agreed with Model One. Criticism of Model Two predominantly centred on aspects of the in-country review model as it has been implemented to date rather than a disagreement with the development of in-country quality assurance and enhancement activities and resources.

Most respondents, especially those who strongly agreed/agreed, sought further clarification of whether in-country reviews were the best enhancement activity and their direct impact on UK TNE. The comments sought further development of TNE activities and resources in addition to an in-country review schedule, as mentioned in the key findings. The common theme regarding an in-country review schedule was that any 'annual' cycle of reviews would need to consider, and to cover, core markets based on TNE student numbers and number of arrangements (for example, number of institutions operating in country), emerging markets, and developing markets.

A majority of respondents considered the proposal of an annual in-country review schedule to cover three countries as reasonable. Most respondents neither agreed nor disagreed with the proposal, with many among them more concerned with the appropriateness and responsiveness than defining a set number. Of primary concern was how the schedule would impact providers' financial and staff resources, in addition to national institutional quality assessment arrangements.

Oversight

Oversight was generally seen by respondents as important to the success of any additional UK TNE enhancement activities or a UK-wide approach to UK TNE. 93% were in favour of UK-wide, sector-led oversight of the current arrangements to ensure that they are, and remain, fit-for-purpose for UK TNE, with only a small minority of seven respondents answering 'no' (these were all institutional responses).

A majority of 60% of respondents answered in favour of external oversight of the proposed in-country review schedule, while 40% were against such oversight. Across most responses it was widely suggested that oversight should be undertaken by an existing body, such as QAA or the UK Standing Committee for Quality Assessment (UKSCQA). Within the comments, the varied interpretation of 'external' and *who* or *what* would be subject of the oversight, suggested that further clarification would be useful when developing any UK-wide approach or recommendations.

Costing and fee models

55% of respondents agreed or strongly agreed that the costing of any eventual quality assurance and enhancement measure should be decided collectively by the sector, but some of the comments showed disagreement with an external organisation being used to cost and price any additional measure, highlighting that this arrangement could prove costly and time consuming.

A majority of 59% preferred a differential fee model to determine how providers were charged for the proposed voluntary QAA TNE in-country review scheme. In comparison, 15% preferred a flat fee model and 21% answered 'no opinion'. The comments from this final group of respondents, expressed an uncertainty of how differential fees would be determined, and some suggested that while a flat fee may appear simpler to determine, it could be disproportionate for some institutions.

The comments included a wide variety of potential parameters seen as requiring consideration in order to determine the differential fee. Value in relation to fees centred on the relevance of the TNE activities decided, especially if in-country reviews are chosen. Although cost was important to respondents, greater significance was placed on providers' ability to choose which TNE activities and in-country reviews to participate in and pay for as appropriate to their TNE provision and internal priorities.

Voluntary participation

A considerable minority (43%) agreed or strongly agreed that regular in-country quality enhancement of UK TNE should be a voluntary QAA Membership service. 32% disagreed or strongly disagreed and 25% of respondents neither agreed nor disagreed. Voluntary participation in quality assurance and enhancement was seen to conflict with the UK-wide approach with which the vast majority strongly agreed/agreed. Participation was seen to benefit the wider UK higher education (HE) sector and it was therefore suggested, by a number of respondents, that the sector commits collectively to the development of UK TNE and UK HE. Voluntary participation, at least for UK TNE providers, was seen by some respondents as exposing UK HE and UK TNE to reputational risk. It was suggested that in-country reviews and other TNE activities were clearly articulated with the existing QAA service - 'International Insights'.

TNE quality assurance and Enhancement Mark or Statement

A majority of respondents (56%) agreed or strongly agreed that buying into TNE quality enhancement activities should be associated with a Mark or Statement. 21% disagreed or strongly disagreed, while 23% neither agreed nor disagreed.

Respondents were concerned that a Mark which was solely awarded based on a payment did not provide assurance of commitment to the quality enhancement of UK TNE or assure a certain quality of TNE provision. The comments expressed concern that, should a Mark be awarded based on payment to a scheme, it would not guarantee the quality of a provider's TNE provision. There was a wide acknowledgement from respondents that a meaningful process which would determine the award of such a Mark or Statement would be costly. Furthermore, some comments questioned the impact of such a Mark in the context of a UK-wide approach and international perceptions of UK TNE.

Annex A

The joint UUK/GuildHE/QAA working group agreed with the merits of adopting a UK-wide approach to quality enhancement of TNE and identified 11 UK-wide principles that should underpin any approach to quality enhancement of UK HE TNE.

Any effective system should:

- 1 be UK-wide
- 2 apply to all degree-awarding bodies who engage in TNE
- 3 be valid for all types of TNE
- 4 be cost-efficient
- 5 be flexible and responsive
- 6 minimise the burden to institutions, avoiding duplication of course or institutional review and aligning with the review processes of professional, statutory and regulatory bodies (PSRBs), where relevant and appropriate
- 7 have the student experience at its heart
- 8 ensure equivalence of student experience and student outcomes between TNE and UK-based students
- 9 retain international trust and maintain the reputation of the UK's quality assurance approach
- 10 be enhancement-led
- 11 be informed by robust metrics where available and align with UK data-informed approaches where possible.